

1   **JOEL F. HANSEN, ESQ.**  
2   Nevada Bar No. 1876  
3   **COOPER LEVENSON, P.A.**  
4   1835 Village Center Circle  
5   Las Vegas, NV, 89134  
6   (702) 366-1125  
7   jfhansen@cooperlevenson.com  
8   Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

10 CLIVEN BUNDY,  
11 Plaintiff  
12 v.  
13 GLORIA NAVARRO  
14 Defendant

Case No.: 2:16-cv-1047-JAD-GWF

**MOTION FOR EXTENSION OF TIME FOR  
PLAINTIFF TO FILE MANDATORY  
STIPULATED DISCOVERY PLAN AND  
SCHEDULING ORDER**

17 COMES NOW, the Plaintiff, CLIVEN BUNDY, by and through his attorney, Joel F.  
18 Hansen, Esq., and moves this Honorable Court for an extension of time to comply with the  
19 Court's Order of September 14, 2016, Document No. 38, regarding the parties' failure to file a  
proposed stipulated discovery plan and scheduling order.

Plaintiff's attorney, Joel F. Hansen, is in the process of withdrawing for health reasons from the *United States v. Bundy et al.* case, a criminal case of which the Court is undoubtedly well aware. Mr. Hansen is also in the process of searching for counsel to take his place as the attorney for Mr. Bundy in both the criminal case and in the case at bar. Due to Mr. Hansen's health problems, due to financial problems involving the case, and due to the fact that Mr. Larry Klayman, Esq., has not achieved pro hac vice status in Nevada as of yet, although his Emergency Petition for Writ of Mandamus is currently pending before the Ninth Circuit, due to all of these

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1 factors, the mandatory stipulated discovery plan and scheduling order has not been completed as  
2 of today's date.

3 Wherefore, it is hereby requested and moved that this Court grant an additional thirty (30)  
4 days up to and including October 23, 2016, to comply with the provisions of LR 26-1 of the  
5 Federal Rules of Civil Practice for the District of Nevada.

6 | Dated: September 30, 2016

Respectfully Submitted,

By: /s/ Joel F. Hansen  
**JOEL F. HANSEN, ESQ.**  
Nevada Bar No. 1876  
**COOPER LEVENSON, P.A.**  
1835 Village Center Circle  
Las Vegas, NV, 89134  
(702) 366-1125  
[jfhansen@cooperlevenson.com](mailto:jfhansen@cooperlevenson.com)  
Attorney for Plaintiff

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that service of the foregoing **MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO FILE MANDATORY STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER** was made through the Court's CM/ECF filing and service system on all counsel of record, including the below-designated counsel, on September 30, 2016:

Greg Addington, Esq.  
Assistant United States Attorney  
100 W. Liberty Street, Suite 600  
Reno, NV, 89501  
(775) 784-5438  
[Greg.addington@usdoj.gov](mailto:Greg.addington@usdoj.gov)

Scott Bogatz, Esq.  
Reid, Rubinstein & Bogatz  
300 South 4<sup>th</sup> St., # 830  
Las Vegas, NV, 89101

/s/ Joel F. Hansen